

HERSHANDHERSH
A Professional Corporation

NANCY HERSH, ESQ., State Bar No. 49091
MARK E. BURTON, JR., ESQ., State Bar No. 178400
RACHEL ABRAMS, ESQ., State Bar No. 209316
JEANETTE HAGGAS, ESQ., State Bar No. 244713
HERSH & HERSH
A Professional Corporation
601 Van Ness Avenue, 2080 Opera Plaza
San Francisco, CA 94102-6388
Telephone: (415) 441-5544
Facsimile: (415) 441-7586

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

STATE OF CALIFORNIA ex rel.)	CASE NUMBER 07-CV-04911-CRB
JAYDEEN VICENTE and JAYDEEN)	
VICENTE Individually,)	DECLARATION OF JEANETTE HAGGAS
)	IN SUPPORT OF PLAINTIFF-RELATOR
Plaintiffs,)	JAYDEEN VICENTE'S MEMORANDUM IN
)	OPPOSITION TO DEFENDANT ELI LILLY
vs.)	AND COMPANY'S MOTION TO DISMISS
)	UNDER RULES 12(b)1, 12(b)(6) AND 9(b)
ELI LILLY AND COMPANY,)	
)	Date: December 7, 2007
Defendant.)	Time: 10:00 a.m.
)	Courtroom: 8, 19th Floor
)	Honorable Charles R. Breyer

HERSHANDHERSH
A Professional Corporation

1 I, Jeanette Haggas, declare:

2 1. I am an attorney duly licensed to practice law before the Courts of the State of
3 California. I am an associate in the law firm of Hersh & Hersh, attorneys of
4 record for Plaintiff in this action.

5
6 2. I have personal knowledge of the facts set forth herein and, if called as a
7 witness, could and would competently testify thereto:

8
9 3. I make this Declaration in Support of Plaintiff-Relator Jaydeen Vicente's
10 Memorandum In Opposition To Defendant Eli Lilly And Company's Motion
11 To Dismiss Under Rules 12(B)1, 12(B)(6) And 9(B).

12
13 4. Attached as **Exhibit 1** is a true and correct copy of the Complaint, filed on
14 May 11, 2007, in the Superior Court for the County of San Francisco.
15 Attached to the Complaint were Exhibits lettered A through N, which are
16 included under Exhibit 1 to this Declaration.

17
18 5. Attached as **Exhibit 2** is a true and correct copy of the LTC Best Practices
19 Newsletter, dated Summer 2002.

20
21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct, and that this declaration was executed on November 16.
23 2007, at San Francisco, California.

24
25 By 
26 JEANETTE HAGGAS

27 - 2 -

28
DECLARATION OF JEANETTE HAGGAS IN SUPPORT OF PLAINTIFF-RELATOR JAYDEEN
VICENTE'S MEMORANDUM IN OPPOSITION TO DEFENDANT ELI LILLY AND COMPANY'S
MOTION TO DISMISS UNDER RULES 12(b)1, 12(b)(6) AND 9(b)